

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
BEAZLEY INSURANCE COMPANY, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No.: 15-cv-5119-JSR
	:	
ACE AMERICAN INSURANCE COMPANY,	:	
and ILLINOIS NATIONAL INSURANCE	:	
COMPANY,	:	
	:	
Defendants.	:	
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**DEFENDANT ILLINIOS NATIONAL INSURANCE COMPANY’S  
NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon Defendant Illinois National Insurance Company’s (“Illinois National”) accompanying Memorandum of Law in Support of its Motion to Dismiss Plaintiff’s Complaint; the accompanying Declaration of Alexander S. Lorenzo in support of Illinois National’s Motion to Dismiss, dated July 31, 2015, and the exhibits attached thereto; Defendant Illinois National will move this Court before the Honorable Jed S. Rakoff, on August 28, 2015 at 3:30 pm, in the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, for an order pursuant to Rule 12(b)(1) and (6) of the Federal Rules of Civil Procedure dismissing Plaintiff Beazley Insurance Company, Inc.’s claims against Illinois National with prejudice for lack of standing and failure to state a claim.

The moving papers for this motion will be served on July 31, 2015, the answering papers will be served on August, 14, 2015, the reply papers will be served on August 21, 2015, and oral argument will be heard on August 28, 2015 at 3:30 pm.

Dated: New York, New York  
July 31, 2015

ALSTON & BIRD LLP

By: /s/ Alexander S. Lorenzo  
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To: Counsel of Record for All Parties